Exhibit A

Komorowski, AnnMarie (Secy-Chi-IP/Tech)

From: Nelson, Cameron (Assoc-Chi-IP/Tech)

Sent: Tuesday, August 25, 2009 12:35 PM

To: loyalpatriot@gmail.com

Subject: FW: Activity in Case 1:09-cv-03955 Blockowicz et al v. Williams et al order on motion for miscellaneous relief (Sent Registered)

Mr. Williams and Ms. Clayborn/Ramey,
Judge Holderman granted our motion for special service. An electronic copy of the order is below. The Court deems you served as of August 20, 2009. If you do not timely answer or otherwise appear, we will promptly move for default judgment.

Once again, please contact us regarding this case as soon as possible.

Cameron M. Nelson
Associate
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.6590 | Fax 312.899.0360
nelsonc@gtlaw.com | www.gtlaw.com

GT GreenbergTraurig

From: usdc_ecf_ilnd@ilnd.uscourts.gov [mailto:usdc_ecf_ilnd@ilnd.uscourts.gov]
Sent: Thursday, August 20, 2009 12:11 PM
To: ecfmail_ilnd@ilnd.uscourts.gov
Subject: Activity in Case 1:09-cv-03955 Blockowicz et al v. Williams et al order on motion for miscellaneous relief

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United States District Court

Northern District of Illinois - CM/ECF LIVE, Ver 3.2.3

Notice of Electronic Filing

The following transaction was entered on 8/20/2009 at 12:10 PM CDT and filed on 8/20/2009

Case Name:	Blockowicz et al v. Williams et al
Case Number:	1:09-cv-3955
Filer:	
Document Number:	15

Docket Text:
MINUTE entry before the Honorable James F. Holderman:Motion hearing held on 8/20/2009 regarding Plaintiffs' motion for [12]for service by special order or, alternative, for leave to conduct limited discovery. The plaintiffs' motion for service by special order is granted. Motion terminated. The Court deems the plaintiffs attempts at service by certified mail and electronic mail adequate service for purposes of this case, and considers today as service having been effectuated. Hearing on prove up is set for 10/6/2009 at 09:00 AM. Documentation is to be filed by 10/1/09. Judicial staff mailed notice (gl,)

1:09-cv-3955 Notice has been electronically mailed to:

Kevin John O'Shea osheak@gtlaw.com,chiedocket@gtlaw.com

Cameron Matthew Nelson nelsonc@gtlaw.com,chiedocket@gtlaw.com

1:09-cv-3955 Notice has been delivered by other means to:

Komorowski, AnnMarie (Secy-Chi-IP/Tech)

From: Acknowledgement [acknowledge@rpost.net]
Sent: Tuesday, August 25, 2009 12:35 PM
To: Nelson, Cameron (Assoc-Chi-IP/Tech)
Subject: Ack: FW: Activity in Case 1:09-cv-03955 Blockowicz et al v. Williams et al order on motion for miscellaneous relief

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Cc:	
Was received by the registration service at:	8/25/2009 5:35:23 PM (UTC) 8/25/2009 12:35:23 PM (LOCAL TIME)
Message ID:	16EF84622A700AC853328A4A318EF08051138901
Network ID:	<827864B735C3FD4BA37594DBD096B8BF033976E4@CHI-EXCH02.gtlaw.com>
Client Code:	

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Komorowski, AnnMarie (Secy-Chi-IP/Tech)

From:	Receipt [receipt@rpost.net]
Sent:	Tuesday, August 25, 2009 1:58 PM
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Subject:	Receipt: FW: Activity in Case 1:09-cv-03955 Blockowicz et al v. Williams et al order on motion for miscellaneous relief
Attachments:	HtmlReceipt.htm; Locked

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loyalpatriot@gmail.com	Delivered to Mailserver	Delivered to 209.85.210.17	8/25/2009 5:35:27 PM	8/25/2009 12:35:27 PM(-500)	

Message Envelope

FROM:	NelsonC@gtlaw.com<NelsonC@gtlaw.com>
SUBJECT:	FW: Activity in Case 1:09-cv-03955 Blockowicz et al v. Williams et al order on motion for miscellaneous relief
TO:	loyalpatriot@gmail.com
CC:	
BCC:	
Network ID:	<827864B735C3FD4BA37594DBD096B8BF033976E4@CHI-EXCH02.gtlaw.com>
Received:	8/25/2009 5:35:23 PM(UTC)
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00AC853328A4A318EF08051138901/ MESSAGE-ID: <16EF84622A700AC853328A4 A318EF08051138901-1@rpost.net>/ Subject: FW: Activity in Case 1:09- cv-03955 Blockowicz et al v. Williams et al order on motion for miscel laneous relief/ Sending Message Body. / 250 2.0.0 OK 1251221727 17si16 3470yxe.134/ /

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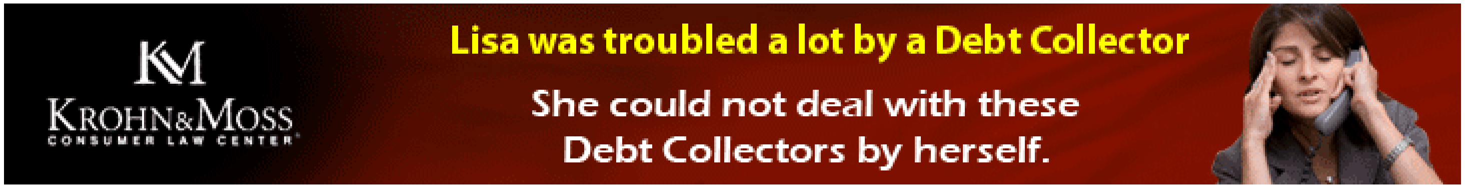
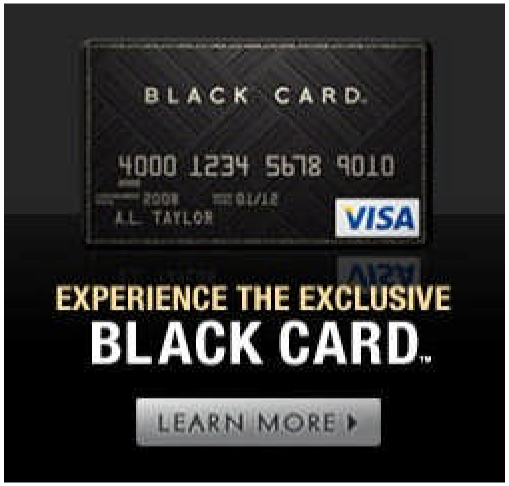
Exhibit B

Complaints Board
Made by the people for the people

Company or Product Name | Everything | SEARCH

Latest Complaints | News & Stories | Tips & Tricks | Questions | Videos | Images | Recalls | Groups | Submit Complaint


KROHN&MOSS
CONSUMER LAW CENTER
Lisa was troubled a lot by a Debt Collector
She could not deal with these
Debt Collectors by herself.



BlackCard.com Ads by Google

Lisa Blockowicz Complaints - Scam and lies

Review all Lisa Blockowicz complaints

Lisa Blockowicz

Posted: 2009-04-22 by Tamara

Scam and lies

Complaint Rating:

Company information:

Lisa Blockowicz
United States

Lisa Blockowicz is a diseased scumbag compulsive liar who is famous for telling people that she is a producer on for the Oprah Winfrey Show. In reality, Lisa is a multiple 12-stepper (Overeaters, Alcoholics, Adult-Children of Alcoholics, etc, etc, etc). Unfortunately, until they come out with CLA (Compulsive Liars' Anonymous), Lisa Blockowicz will not get the help she requires. This is a warning to all who come in contact with this manipulative, dishonest woman...Lisa is an expert at playing the hapless, helpless victim until she decides to point her accusatory finger at you...then watch out! Lisa Blockowicz enjoys masquerading as a heterosexual woman...she's not. Lisa has repeatedly entered Adult Gentleman's Clubs and confronted management for 'exploiting the women who work there'. She proclaims that this is her feminist duty. Additionally, anything that you do not want stolen from your home should be super-glued to wherever or whatever it is on or it will eventually disappear post-haste. Lisa Blockowicz is the consummate scumbag sister of Megan Blockowicz aka Katie Kelley who is currently incarcerated at the Southern Nevada Correctional Facility for Women. This dynamic duo has spent many years cultivating their talent for blaming men for victimizing and brutalizing them. Unfortunately, they are the ones that hurt anyone that has the misfortune of coming into contact with them. Avoid this woman or face the perils of her mental illness. Let this be a warning to all-you do not want to become involved with Lisa Blockowicz!

Comments | United States | Products & Services

Recently Discussed Complaints

1. (0 mins ago)
smoke 51.com
cancelling my order

2. (0 mins ago)
Innovative International Resorts Inc.
FRAUD/SCAM

3. (1 mins ago)
Tammy Pence
Is this A Scam

4. (2 mins ago)
TD Bank
Direct Deposit

5. (3 mins ago)
TD Bank
Off line - still

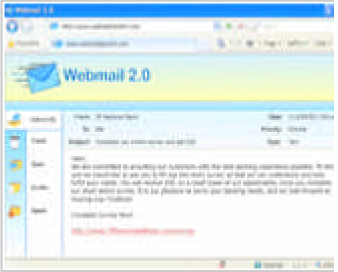
Submit complaint

Extra Features

Register Login

Videos

Beware of Fake Websites and Phishing Scams



More Vide

Consumer Tips & Tricks

Five Ways to Argue Less About Money

How to terminate the account of the Spammer?

Surviving The Invitation Season

Worst rating

1. ROBIN SCHULDER (-40)
2. Lance Puig + York Street Properties (-17)
3. mobile draw@live.com (-12)
4. Dazzlewhite Pro Teeth (-12)
5. Dazzle white and Smile Brite (-11)
6. Elitepack (-11)
7. Wellness Lab. (-10)
8. CLEANWHITES (-8)
9. Ultifreshwell (-8)
10. PWW*INTERNET BIZ KIT (-7)

Subjects of Wide Speculation

1. ROBIN SCHULDER (193)
puppy mill
2. mobile draw@live.com (60)
HOW TO CLAIM MY PRIZE MONEY
3. Lance Puig + York Street Properties (43)
False Representations + Payment Scam
4. Raintree (42)
Trying to charge a "Special Assessment"
5. Dazzlewhite Pro Teeth (30)
Scam, theives, liars
6. CAMFROG PHILIPPINES (25)
ABUSING OF POWERS IN ROOM
7. hate (23)
hatered
8. Wyndham Vacation Resorts /

Share with others:

Was the above complaint useful to you? Yes No

Debt Harassment Relief
Stop Collection Agency Harassment. Register Your case w/ Us.100% Free
WeStopDebtCollectors.com/Debt_Help

Guaranteed Credit Cards
Guaranteed Approval Credit Cards. Compare Offers & Apply Online.
www.CreditCards.com

Nissan GT-R Clearance
Nissan Dealers Need to Make Sales Goals. Get Our Special Web Price.
DealersClearingLots.com/GT-R

ILD Teleservices
Resolve Transaction Issues Online Open, Track, Resolve Payment Issues
ILDTeleservices.com/Resolution

Ads by Google

Comments

Sort by: Date | Rating

160 days ago by ron -2 Votes

This is total BS! Lisa is a loving, kind teacher of undeprivileged kids -this post is totally false-written by a lying
scumbag--whose has no means of employment. He makes his living using women--come out and show yourself-you gutless swine! He moves around because he is wanted in several states! the FBI is on to you--it's only a matter of time before you wind up in jail--just like the Craig's list guy from Boston. Watch your back!

160 days ago by ron -2 Votes

This is total BS

160 days ago by Scott +2 Votes

This seems to be an accurate description of Lisa. I have seen this lady in action and it is not pretty.

160 days ago by Lisa -1 Votes

Ron I appreciate your kind words about me and confronting David, but don't waste your time. David

Ads by Google
- Consumer Reviews
- Crib Consumer Reviews
- Jeep Consumer Reviews
- Consumer Reviews Tool

Latest Groups

hedi
va home safty inspections
The Best Of My3cents Rant and Raves
AMC BOYCOTT
Getlostdancing and upathetic a
ElSqueakos latests roles

Today's Mess-Up Photo

Salad Dreesing?

vinegar
peanut butter & jelly
salad dressing
pastries
tortillas
bread
1

More Mess-ups

Categories

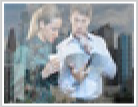
- Airlines
- Arts & Humanities
- Books
- Building, Construction
  - Flooring Installation

Timeshares (22)
Scam promise!

9. Grammar Spells Association (22)
Personal Spellchecks Of The Worst Kind

10. Elitepack (22)
Rip off

Latest News & Stories



Next Bank of America CEO Must Rebuild Firm's Image

Economy Sends Numerous Signals of Rebound

The Fine Print on the U-Return Plan by GM

Stay Away

1. ouke company (24)
2. Bank of America (23)
3. AcaiBurn (22)
4. Nokia (17)
5. wholesale2wd.COtrading.,LTD (54)
6. DirecTV (19)
7. Dazzle White (16)
8. Sears (14)
9. TD Bank (11)
10. Elitepack (7)

Latest Questions

hi again,
MESSAGE ON MY MOBILE PHONE
Refund
i won
How can I collect the prize money?

J Williams sent this link to me via my facebook page so I am aware of this. He hides behind other names and I'm not sure why. If he has something to say, he should just say it and sign his real name but he's a coward and a bully. I mean, really, this is a grown man who is still bullying people. What are we? In fifth grade? Just so you know, he is sick abusive man who has been harassing my family for over 20 years. It's rather boring, but sometimes good comedy like this post. Anyway, the story is he married my sister Megan and he abused her for years. If you looked up the word Domestic Violence in the dictionary you would see his picture. Anyway, Megan got away from him, they got divorced, gosh, over 15 years ago but he continues to stalk her and my family. David has no job, abuses her current girlfriend, and is a sorry excuse for a father so don't expect anything less from him than something like this. Do you know he moves his son around every six months and will not let his own daughter know where he lives? What kind of father is that? So while he could be acting as a good father, he has decided to dedicate his life to harassing my family. Great choice, huh? He has no life -- it's sad. So rather than get angry, just pray for the dude. He's sick. And, don't get involved because he will just start stalking you and harassing you too. He has no job so has a lot of time to do stuff like this. For some sick reason this helps him feel good. Just let him go. He's just a big bully with nothing better to do. Take care, Lisa

160 days ago by Cody +1 Votes

Me thinks that Ron is Lisa.

160 days ago by gayle +1 Votes

The Blockowicz family doesn't have to appear on the Jerry Springer show, the Blockowicz family is the Jerry Springer show.

160 days ago by ron -1 Votes

No David--Ron is real--and is your absolute worst nightmare!--like I said watch your back!

160 days ago by gayle +1 Votes

Is Ron dangerous too? It sounds like you know a lot of dangerous people. I have always thought of the name Ron as someone with a gentle soul. Is your sister really in jail??

160 days ago by Carolyn 0 Votes

The great thing about the internet is that degenerates like Lisa Blockowicz are easily exposed for the liars that they are. Here are some links regarding her sister...

http://www.doc.nv.gov/notis/detail.php?offender_id=1033445

http://www.nevadaappeal.com/article/20060324/NEWS/103240086

http://www.nevadaappeal.com/article/20070117/NEWS/101170075

- Roofing
- Contractors
- Window and Door Installation

Business & Finances
- Banks
- Scam & Fake Checks
- Loans
- Collections Agencies
- Tax Services
- Bad Business Partners
- Credit Cards
- Savings & Investments
- Equipment Leasing & Financin
- Credit Report Websites
- Inheritance Scams

Cars, Parts & Vehicles
- Car Rental
- Auto Insurance & Loan
- Car Service Centers
- Car Dealers
- Gas Stations
- Car Driving Schools
- Towing
- Motorcycles & Scooters

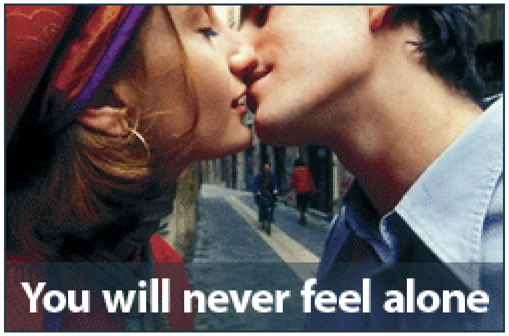
Clothing, Shoes & Acc
- Dry Cleaners & Laundry

Computers & Accessories

Consumer Electronics
- Mobile & Cell Phones
- Vacuum Cleaners
- Washing Machines
- Digital Cameras

E-Shopping

Education
- Colleges and Universities
- Schools
- Driving Schools



http://www.nevadaappeal.com/article/20090325/NEWS/903259990/

If you click on the following link and enter the name Megan Williams it returns convictions for Domestic Violence and Hit/Skip:

http://docket.webxsol.com/mansfield/index.html

Additionally, if you click on the following links you can hear voicemail messages that this bitch left for her ex-husband...she wants to get back together with him. She also says that she was divorced twice in one week to 2 different guys.

http://www.myspace.com/460592764

Therefore, I would have to say that Lisa Blockowicz is as big a liar as her sister. Working with underprivileged children? Translate: can't get a job in a good school district.

The original posting by Tamara sounds incredibly accurate. This lady is a carbon copy of her sister Katie Anne Kelley who took my best friend and her husband to the tune of $3500. Both of these turds, Lisa and Megan aka Katie Kelley, should have been flushed a long time ago. Instead of taking responsibility for their actions, they blame the victims. What a sick couple of ladies you are. Dayton Nevada is a much safer place without you and your sister in it.

158 days ago by gayle 0 Votes

Wow Carolyn really shut Lisa up. I looked at all of the links and heard the disturbing voice mail messages. Lisa I think that you have a lot of problems! I think it is interesting that you call David dangerous, you are the dangerous person, telling David to watch his back?? What is that about?? Maybe you should go to some more 12 step meetings.

141 days ago by Robert Bork 0 Votes

Check out the myspace page of Lisa's sister. Very informative.

http://www.myspace.com/401752225

32 days ago by Mary McBlocko 0 Votes

Lisa Blockowicz has filed a law-suit in Illinios requesting that the court mandate the removal of these online psots. Well here is a news flash for that fat, worthless, sack of shit...FUCK YOU! Fuck your lawyer. Fuck the court. The postings will remain. Karma is a bitch, and so are you. If you did

- Entertainment
- Fake & Novelty ID
- Family & Relationships
  - Deadbeat Parents
  - Sexual Abuse
  - Online Dating Services
  - Astrology Readers
  - Neighbors
- Food
- Furniture
  - Mattresses
- Gambling Games
- Government & Police
  - Passport Services
  - Non-profit Organizations
  - Government Grants
  - Citizenship and Immigration Services
- Health & Beauty
  - Health & Life Insurance
  - Plastic Surgery
  - Medical Negligence and Deficiency
  - Diet Products
  - Cosmetics
  - Dental Services
  - Vision, Glasses, Lenses
  - Drug Stores
  - Hair and Beauty Salons
  - Weight Loss Products and Programs
  - Beauty & Day Spas
  - Doctors
  - Rehabilitation Centers
- Home & Garden
  - Pool & Bath Services
  - Security Services
  - Appliances

not want people posting information about you, then you should have behaved yourself better. The interesting thing about the Blockowicz family is that they have no compunction about behaving like scumbags...they just want it to remain a private issue. Too bad. There is a reason that inbred, backward hillbillies should not be allowed to conceive children...you and Katie Kelley and are it.

Post your Comment

Please check text spelling before submitting a comment

Your attitude towards Complaint ○ Agree ◉ Neutral ○ Disagree

Comment text

Attach photos (optional) Browse...

Submit

- Utility Services
- Plumbing Services
- Hotels
- Internet Services
- Hosting & Web Design
- Internet Providers
- Jewelry & Watches
- Job & Career
- Bullying and Harassment at Work
- Work at Home
- Employment, Staffing, Recruiting Agencies
- Employers
- Employees
- Model & Talent Agencies
- Kids & Baby
- Law & Civil Rights
- Lawyers and Attorneys
- Solicitors
- Magazines & Newspapers
- Movement & Delivery
- Nature & Environment
- News & Media
- Online Scams
- Lottery Scams
- Ebay Scams
- Alibaba Scams
- Phishing
- Online Surveys
- Sweepstakes
- PTC/PTR Sites
- Other
- Pets & Animals
- Animal/Pet Hospitals
- Cat Breeders
- Dog Breeders
- Products & Services

- Flowers Delivery
- Photo Services
- Department Stores
- Cleaning Services / Laundry
- Tobacco Products
- Retail Stores
- Public Transportation & Taxi
  - Traffic Problems
- Real Estate
  - Mortgage Companies
  - Apartments Rental
  - Home Insurance
  - Timeshares / Vacation Rentals
  - Condo and Home Owners Associations
  - Landlords
- Restaurants & Bars
  - Fast Food Restaurants
- Scam Contests
  - SMS Scam Contests
- Society & Culture
  - Psychics & Mediums
  - Religion and Spirituality
- Software & Games
  - Antivirus Software
- Sports & Recreation
  - Fitness Centers
  - Fitness / Exercise Equipment
- Telecommunications
  - Mobile/Cellular Service Providers
  - International Calling Cards
- Telemarketing
- Travel & Vacations
  - Travel Agencies
  - Vacation Clubs
- TV, Music & Video
  - Satellite & Cable TV

- DVD Order & Rental
- Annoying Commercials
- Movies
- Unauthorized Charges
- Unauthorized Mobile Charges
- Unsolicited Phone Calls
- Wedding Services

Suggest new category

Smile upon Life :)

Three blondes were walking in the forest one day...

RSS

Submit Complaint | Consumer Tips & Tricks | News & Stories | Recalls | Groups | View full list of Companies | Updated Complaints | Search Terms | Suspicious Companies | Complaints by Countries | Indian Consumer Complaints Forum | Latest Complaints | Privacy Policy | Thank you Emails

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Exhibit C

Komorowski, AnnMarie (Secy-Chi-IP/Tech)

From:	Komorowski, AnnMarie (Secy-Chi-IP/Tech)
Sent:	Thursday, October 01, 2009 3:49 PM
To:	loyalpatriot@gmail.com
Cc:	NelsonC@gtlaw.com
Subject:	Lawsuit Against Joseph David Williams and Michelle Ramey in the Northern District of Illinois (Sent Registered)
Attachments:	Motion for Default Judgment Inc Exhibits.pdf

Good Afternoon:

Please find attached correspondence regarding the lawsuit against Joseph David Williams and Michelle Ramey in the Northern District of Illinois sent on behalf of Cameron Nelson.

Thanks & Regards,

AnnMarie Komorowski
Assistant to Howard Silverman, Cameron Nelson & James Lukas, Jr.
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.236.4934
komorowskia@gtlaw.com | www.gtlaw.com

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Sent: Thursday, October 01, 2009 3:49 PM
To: Komorowski, AnnMarie (Secy-Chi-IP/Tech)
Subject: Ack: Lawsuit Against Joseph David Williams and Michelle Ramey in the Northern District of Illinois

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Was received by the registration service at:	10/1/2009 8:49:20 PM (UTC) 10/1/2009 3:49:20 PM (LOCAL TIME)
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Client Code:	

Note: Bcc addresses will be included in your Registered Receipt.

NOTE: While your message is already on its way, the process of gathering information for your Registered Receipt™ e-mail may take several hours. You will receive a Registered E-mail® receipt when the RPost® registration service has confirmation of the delivery of your message.

Service Language Preference:				**Note:* The service does not translate your message or attachments			
English	French	German	Spanish	Portuguese	Dutch	Russian	Indonesian

An RPost Service

RPAUTH:784CAAD007BB472A2BF06356066C34F7A891CC0B
RPACCOUNT:301070001.

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Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Blockowicz, Mary Blockowicz, and Lisa Blockowicz, individuals,	)	
	)	Civil Action No.:
Plaintiffs,	)	
	)	Judge:
v.	)	
	)	Magistrate:
Joseph David Williams and Michelle Ramey, individuals,	)	
	)	
Defendants.		

COMPLAINT

Plaintiffs David Blockowicz and Lisa Blockowicz allege against Defendants Joseph David Williams and Michelle Ramey as follows:

NATURE OF ACTION

1. This is an action for defamation, including defamation *per se*, false light, and reckless infliction of emotional distress. Plaintiffs seek compensatory damages, punitive damages, attorneys' fees, costs, and preliminary and permanent injunctive relief.

JURISDICTION AND VENUE

2. This Court has diversity jurisdiction over this case pursuant to 28 U.S.C. §§ 1332.

3. This Court has personal jurisdiction over Defendants Joseph David Williams and Michelle Ramey, currently residents of Oregon, because they have intentionally directed harmful and egregious tortious acts at Plaintiffs, causing injury and having other harmful effects in this state, related to this specific cause of action. 735 ILCS 5/2.209; Fed.R.Civ.P. 4.

4. Venue is proper in the United States District Court for the Northern District of Illinois pursuant to 28 U.S.C. § 1391(a)(2).

PARTIES

5. David Blockowicz is 67 years old, and resides in Illinois with his wife of forty-two (42) years, Mary Blockowicz. He is a principal of his own accounting firm, Blockowicz and Tognocchi LLP, which has a principal place of business at 1701 East Lake Avenue, Suite 480, Glenview, Illinois.

6. Lisa Blockowicz is also an Illinois resident and the oldest of David and Mary Blockowicz's four adopted children. She is 39 years old, and an elementary school teacher for Chicago Public Schools. Though not parties to this case, Lisa's other siblings are Brendan, age 38, Megan, age 36, and Scott, age 34.

7. In or around 1992, Megan Blockowicz married Defendant Joseph David Williams. Megan Blockowicz and Joseph David Williams divorced in or around 1999 or 2000. Joseph David Williams was physically and emotional abusive to Megan Blockowicz and, as set forth below, he has begun directing his aggressive behavior towards Megan's family, including Megan's parents David and Mary Blockowicz, and her sister Lisa Blockowicz. On information and belief, Joseph David Williams resides in or around Hillsboro, Oregon.

8. On information and belief, Michelle Ramey a/k/a Michelle Clayborn, is a long-time associate of Joseph David Williams who also resides with him in or around Hillsboro, Oregon.

ALLEGATIONS COMMON TO ALL COUNTS

9. On information and belief, Joseph David Williams has been posting and continues to post false statements about David Blockowicz, Mary Blockowicz, and Lisa Blockowicz on numerous websites.

10. The website <ripoffreport.com> is a purported "consumer advocacy" website

which allows consumers to post anonymous criticisms about other individuals and companies. <Ripoffreport.com>. <Ripoffreport.com> encourages users by promising "justice" and by promising that filing a report is "almost like creating your own website." <Ripoffreport.com> also promises potential media exposure. <Ripoffreport.com> has an express policy of **never** removing reports from its website, even when it has been put on notice that the reports are false and defamatory. On information and belief, <Ripoffreport.com> often attempts to charge individuals and companies money if they wish to respond to "reports" posted on <ripoffreport.com>.

11. On information and belief, Joseph David Williams and/or his associate, Michelle Ramey, have engaged in a pattern of posting false "reports" at <ripoffreport.com> directed at Lisa Blockowicz, David and Mary Blockowicz, Megan Blockowicz, and even Joseph David Williams' own daughter. Among the false statements found at the <ripoffreport.com> website:

- Defendants refer to David, Mary and Lisa Blockowicz as Megan's "scumbag family."
- Defendants falsely state that "Megan's father was an incestuous creep who forced all of his children to satisfy him sexually."
- Defendants spin a false tale about Mary and Lisa Blockowicz interacting with Nevada Child Protection Services.
- Defendants falsely state that the Blockowicz family is a danger to Megan's children.
- Defendants falsely suggest that Lisa Blockowicz uses a number of aliases.
- Defendants call Lisa Blockowicz a "Scumbag Con-Artist, Diseased Alcoholic, Compulsive Liar, Thief."
- Defendants state that Lisa Blockowicz is a lesbian, and is "diseased."

These statements are just some of the false statements published by Defendants.

12. On information and belief, the statements posted at <ripoffreports.com> are all

posted by Joseph David Williams and/or his associate, Michelle Ramey, under false usernames carefully selected to attempt to make the false statements appear more credible. For example ,in one instance Defendants posted a “report” at <ripoffreports.com> wherein they falsely claim to be an employee of a state government agency.

13. On information and belief, Defendants update the false posts and “reports” from time to time, including as recently as March and April, 2009, by revising the original reports. On further information and belief, these changes have the effect of increasing the relevance of these statements to internet search engines.

14. On information and belief, Joseph David Willams and/or his associate, Michelle Ramey, have also posted “comments” in support of the false statements, under yet additional false usernames. In those “comments,” Defendants further attack the Blockowicz family and attempt to add credibility to their false statements.

15. On information and belief, Defendants’ practice of adding false user comments to their “reports” has the effect of increasing the relevance of those reports to internet search engines, and further has the effect of republishing the false statements.

16. On information and belief, Defendants have also posted similar and additional false statements at <Facebook.com>, <MySpace.com>, and <complaintsboard.com>. Defendants use yet additional false usernames to post these statements and to more effectively disseminate their false statements to the public. This activity is current and ongoing, as many of these additional publications occurred in Spring, 2009.

17. Defendants’ false statements occupy the top search engine results for the search terms “David Blockowicz” and “Lisa Blockowicz” in the most popular search engines.

18. Defendants’ false statements are so widely publicized that Plaintiffs find

themselves having to explain and defend the false statements in their private and personal lives. Having to address these false statements is especially embarrassing and humiliating for Lisa Blockowicz, who is a Chicago Public Schools teacher.

19. On information and belief, Defendants' false statements have caused lost professional and business opportunities for Plaintiffs.

Count I – Defamation

20. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

21. Defendants Joseph David Williams and/or Michelle Ramey have made the false statements detailed above, and yet other false statements, regarding Lisa Blockowicz, David Blockowicz, and Mary Blockowicz.

22. Defendants Joseph David Williams and/or Michelle Ramey have repeatedly published those statements via the internet, both in their original "reports" as well as through "comments," all posted under false usernames.

23. Defendants' false statements constitute defamation *per se* under all applicable laws, by falsely accusing Plaintiffs of committing crimes, by suggesting that at least Lisa Blockowicz has a loathsome communicable disease, by prejudicing Lisa Blockowicz in her profession as an elementary school teach and by prejudicing David Blockowicz in his profession as an accountant, and by imputing particularly disgusting acts of fornication to Plaintiffs.

24. Defendants' false statements have damaged each of Plaintiffs in both their professional and personal lives, by interfering with Plaintiff's business relationships, by damaging Plaintiffs' reputations in their communities, and by interfering in Plaintiffs' personal relationships with persons afraid that some of the false statements might be true.

Count II – False Light

25. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

26. Defendants' false statements detailed above, and yet other false statements, have placed Plaintiffs in a false light before the public.

27. Defendants' false statements are highly offensive to reasonable persons.

28. Defendants published these false statements with actual malice towards Plaintiffs, as illustrated by the malicious tone of the statements, the clearly false nature of the statements, and the intent to harm Plaintiffs through the false nature of the statements.

Count III – Reckless Infliction of Emotional Distress

29. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

30. Defendants' conduct detailed above, and on information and belief Defendants' yet-undiscovered conduct, is extreme and outrageous.

31. Through the intentional conduct described in this Complaint, Defendants intend to inflict severe emotional distress upon Plaintiffs, and are further aware that there is at least a high probability that their conduct will cause severe emotional distress.

32. Plaintiffs have in fact suffered severe emotional distress as a result of Defendants' conduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that the Court grant the following relief:

A. A preliminary and permanent injunction prohibiting Defendants, their agents, servants, employees and/or all persons acting in concert or participation with them, or any of them, from publishing any further statements regarding the Blockowicz family.

B. An order requiring Defendants to remove all statements regarding the Blockowicz family from all websites where Defendants have posted such statements.

C. An order to third party websites where Defendants have posted their defamatory statements that all such material be taken down immediately, that all accounts controlled by Defendants be deactivated, and that those third parties take reasonable, available steps to prevent Defendants from posting further statements.

D. An award of compensatory damages, including damages for emotional distress, in the amount of at least $100,000;

E. An award of punitive damages to Plaintiffs in an amount to be determined at trial;

F. An award of interest, costs and attorneys' fees incurred by Plaintiff in prosecuting this action; and

G. All other relief to which Plaintiff is entitled.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues presented in this complaint.

DATED: June 30, 2009.

Respectfully Submitted,

s/Cameron M. Nelson

Cameron M. Nelson
Kevin J. O'Shea
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77 West Wacker Drive, Suite 2500
Chicago, IL 60601
Telephone: (312) 456 8426
Facsimile: (312) 899 0407

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Blockowicz and Lisa Blockowicz, individuals,	)	
	)	Civil Action No. 1:09-cv-03955
Plaintiffs,	)	
	)	Judge Holderman
v.	)	
	)	Magistrate Judge Cox
Joseph David Williams and Michelle Ramey, individuals,	)	
	)	
Defendants.	)	

DECLARATION OF CAMERON M. NELSON IN SUPPORT OF PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT, PERMANENT INJUNCTION AND AN AWARD OF DAMAGES

I, Cameron M. Nelson, hereby declare and state as follows:

1. I am an associate at the law firm of Greenberg Traurig, LLP, and am counsel to Plaintiffs in this case. I have extensive experience in obtaining injunctive relief in Federal Courts and the costs associated with that type of work. I have reviewed all bills and payments in this case.

2. To date, Plaintiffs have been billed and have paid $16,656.24 in attorney's fees and costs. Those fees reflect substantial discounts that have been applied to Plaintiffs' bills, in light of their status as individuals and the facts of this case. As of the time of filing this motion, there is approximately an additional $4,000 in attorney's fees in "WIP" (work in progress), though some of those fees may also be discounted before they are billed to Plaintiffs, again in light of the facts of the case. These fees are consistent (though slightly above) our initial estimates to Plaintiffs for the work completed to date, and are also consistent (though somewhat below), with fees we would ordinarily charge for this type of work.

3. We expect incur further fees in following up on Plaintiffs' Motion for Default, including further fees associated with enforcing any orders from the Court and securing the "takedown" of the defamatory statements at issue in this case. Accordingly, we believe total fees, after discounts and enforcement efforts, will be approximately $20,000.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Certification was executed on October 1, 2009 at Chicago, Illinois.

____

Cameron M. Nelson

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Blockowicz, Mary Blockowicz, and Lisa Blockowicz, individuals,	)	
	)	Civil Action No. 1:09-cv-03955
Plaintiffs,	)	
	)	Judge Holderman
v.	)	
	)	Magistrate Judge Cox
Joseph David Williams and Michelle Ramey, individuals,	)	
	)	
Defendants.	)	

[PROPOSED] PERMANENT INJUNCTION

This matter comes before the Court on Plaintiffs' Motion for Default, Permanent Injunction, and Nominal Damages.

The Court finds that Defendants have received the Complaint and Motion for Preliminary Injunction in this case, have elected not to respond to those pleadings, and have publicly stated their decision not to respond to the pleadings, as well as their intent to continue the conduct complained of in the Complaint. Having reviewed the well-pled allegations of the Complaint and supporting exhibits, the Court finds that Defendants have defamed and defamed *per se* the Plaintiffs, have portrayed Plaintiffs in a false light, and have engaged in intentional and reckless infliction of emotional distress against all Plaintiffs. Defendants have particularly published the following defamatory and defamatory *per se* statements:

1. Defendants have published false statements that David and Mary Blockowicz assisted their daughter, Megan Blockowicz, in avoiding various criminal prosecutions.

2. Defendants have published false statements that a Nevada Child Protection Officer had discussions with Mary and Lisa Blockowicz.
3. Defendants have published false statements attributed to a Detective Lyons purportedly of the Winnetka Police Department.
4. Defendants have published false statements of physical and sexual abuse regarding David Blockowicz.
5. Defendants have published false statements asserting that Lisa Blockowicz is a lesbian, con-artist, diseased alcoholic, and thief.

The Court further finds that Defendants change addresses frequently, as much as twice a year, and have publicly stated an intent to ignore any judgment of this Court.

In light of the above findings, the Court further finds that Plaintiffs have suffered and will continue to suffer irreparable harm if an injunction regarding these false and defamatory statements does not issue, that Plaintiffs have no adequate remedy at law because of Defendants' announced intention to ignore the Court's judgment and because of the unlikelihood that Plaintiffs will recover any monetary judgment, that the balance of the hardships favors Plaintiffs because an injunction can be appropriately tailored to limit only the illegal conduct, and that the public interest favors granting the Plaintiff relief.

IT IS THEREFORE ORDERED that Defendants, having failed to answer the Complaint or otherwise defend this case, and having notice and having been served with the Summons and Complaint, are hereby held in default judgment on all counts stated in the Complaint.

IT IS FURTHER ORDERED that Defendants, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise, are permanently enjoined and restrained from:

(a) Publishing statements of a factual nature, or which appear to be a factual nature, regarding Plaintiffs alleging that any of them assist their daughter Megan Blockowicz in avoiding criminal prosecutions, that public officials have had purported conversations with Plaintiffs, that allege physical or sexual abuse, that allege any of Plaintiffs are homosexuals, and that allege that any of Plaintiffs are diseased, alcoholics, con-artists or thieves.

(b) Publishing any false and/or defamatory statements or "reports" regarding Lisa Blockowicz, David Blockowicz, and/or Mary Blockowicz at the websites <ripoffreports.com>, <badbusinessbureau.com>, and <complaintsboard.com>;

(c) Publishing "comments" on <ripoffreports.com>, <badbusinessbureau.com>, and/or <complaintsboard.com> regarding Lisa Blockowicz, David Blockowicz, and/or Mary Blockowicz in support of false and/or defamatory statements; and

(d) Further publishing or disseminating prior statements made by Defendants about Lisa Blockowicz, David Blockowicz, and/or Mary Blockowicz.

IT IS STILL FURTHER ORDERED that Defendants shall immediately remove all postings identified in Plaintiffs' Complaint and Motion for Preliminary Injunction from any and all websites where those statements are currently published, and Defendants will refrain from republishing those statements;

IT IS STILL FURTHER ORDERED that, should Defendants fail to immediately remove all false statements identified in Plaintiffs' Complaint from the websites where those statements are currently published, Plaintiffs' counsel may directly contact the third party hosts of their websites, who shall make reasonable efforts to ensure the false statements are removed;

IT IS STILL FURTHER ORDERED that in the event Plaintiffs uncover new defamatory statements published by Defendants which Plaintiffs believe to be in violation of this Order, Plaintiffs shall be entitled to a further Order from this Court directing both Defendants and any relevant third party(ies) to remove the statements, but only upon motion before the Court, with adequate notice to Defendants and relevant third party(ies). Plaintiffs shall be entitled to an additional award of reasonable attorney's fees associated with any new acts of defamation which require Court intervention to enforce this order.

IT IS STILL FURTHER ORDERED that Defendants may seek modification of this order, upon motion with reasonable notice to Plaintiffs, if in good faith Defendants believe that a change in facts or circumstances renders this order an unlawful impingement upon Defendants' free speech rights.

IT IS STILL FURTHER ORDERED that Plaintiffs are awarded twenty thousand dollars ($20,000) in nominal, combined damages for all three Counts of Plaintiffs' Complaint.

DATED: October __ , 2009.

____
United States District Judge

CHI 58,390,154v2 10-1-09